

Exhibit 14

From: Gadeir Abbas
To: [Powell, Amy \(CIV\)](#); [Roth, Dena M. \(CIV\)](#); [Konkoly, Antonia \(CIV\)](#); [Lena F. Masri, Esq.](#); [Ahmed Mohamed](#); [Jack Cooper](#); shereef@akeelvalentine.com
Cc: [Healy, Christopher \(CIV\)](#)
Subject: RE: Elhady -- additional depo notices
Date: Wednesday, February 14, 2018 2:31:28 PM
Attachments: [image001.png](#)

Hey Amy,

This should work. I just called to discuss briefly and seek a bit of clarification.

Unfortunately, we're racing to finish all of our responses by 5 so wouldn't be able to file until after hours.

We'd also propose doing this as a joint motion rather than a consented motion. I think that's the best shot at having the court weigh in on Friday.

Regards,

Gadeir Abbas, Esq.
Senior Litigation Attorney

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Licensed to practice in VA, not in DC.
Practice limited to federal matters.

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From: Powell, Amy (CIV) [mailto:Amy.Powell@usdoj.gov]
Sent: Wednesday, February 14, 2018 1:23 PM
To: Gadeir Abbas <gAbbas@cair.com>; Roth, Dena M. (CIV) <Dena.M.Roth@usdoj.gov>; Konkoly, Antonia (CIV) <Antonia.Konkoly@usdoj.gov>; Lena F. Masri, Esq. <lmMasri@cair.com>; Ahmed Mohamed <aMohamed@cair.com>; Jack Cooper <jCooper@cair.com>; shereef@akeelvalentine.com
Cc: Healy, Christopher (CIV) <Christopher.Healy@usdoj.gov>
Subject: RE: Elhady -- additional depo notices

All –

We have given further thought to two of Plaintiffs' proposals and are inclined to consent. Specifically, you asked if Defendants would consent to an extension of the discovery deadline for the purpose of completing depositions. You also asked whether it made sense to table the issue of the FBI/TSA/CBP depositions and their appropriate scope until after the TSC deposition. I think we can consent to both of those proposals as we understand them, with a few conditions:

1 – The extension of discovery will be solely for the purpose of completing depositions noticed or scheduled to date (ie – Defendants are not consenting to additional depositions).

2 – Defendants reserve all of their objections to the depositions of FBI/TSA/CBP. We will not move to quash them solely on the basis that they are untimely but we can and will litigate the propriety of the noticed topics, and the proportionality of sprawling 30(b)(6) deposition topics at this late stage in discovery. I understand that Plaintiffs are likely to want to "fill in the gaps" in TSC testimony using testimony from other agencies. We think the "gaps" in *relevant* information may be quite limited and subject to discovery in some other, less burdensome way. And maintain our objections to the topics, as explained on yesterday's call (and last Friday's motion).

3 – The motion needs to be made ASAP, in time for it to be discussed, if necessary, at the hearing on Friday. If you are ready to file it, we can send you some language reflecting the Government's position/consent.

I hope this approach permits us to resolve a few things without motions practice, at least for now. Please let us know what you think.

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From: Powell, Amy (CIV)

Sent: Tuesday, February 13, 2018 4:56 PM

To: 'Gadeir Abbas' <gAbbas@cair.com>; Roth, Dena M. (CIV) <droth@CIV.USDOJ.GOV>; Konkoly, Antonia (CIV) <ankonkol@CIV.USDOJ.GOV>; Lena F. Masri, Esq. <lmagri@cair.com>; Ahmed Mohamed <aMohamed@cair.com>; Jack Cooper <jCooper@cair.com>; shereef@akeelvalentine.com

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